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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN  
BROADBENT; GINA ROHBOCK; NOLAN  
BARLOW; JASON BLACK; MAY MUSSER;  
HOLLY BISTLINE; LAWRENCE BARLOW;  
STEVEN DOCKSTADER; MARVIN COOKE;  
HELEN BARLOW; VERGEL BARLOW;  
CAROLE JESSOP; BRIELL LIBERTAE  
DECKER f/k/a, LYNETTE WARNER; AMY  
NIELSON; SARAH ALLRED; THOMAS  
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION OF  
THOMAS (JEFFS) CAFARELLI**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Thomas Jeffs, presently known as Thomas Cafarelli, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.

2. I am a Plaintiff in the above-captioned matter.

3. I make these statements based on my own knowledge and belief.

4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 26, 2022.

5. Based on my TVPRA and fraud claims against Warren Jeffs, I conservatively estimate that I suffered damages as summarized in this Damages Declaration.

6. I was required to work with little or no compensation for businesses controlled by Jeffs. To the extent I had set hourly rates, they seemed to fluctuate and were controlled by my FLDS employers, making it uncertain what all those rates were. Much of my work history and forced donations (withheld wages) from the time I was about 14-years-old until I left the FLDS are set forth in trial Exhibit A which itemizes my lost wages at \$502,202.

7. While I was under Jeffs' control, Jeffs knowingly forced me and threatened me with force to obtain my labor and services. Jeffs also knowingly used physical restraint and the threat of physical restraint by confining me in various houses of hiding and compounds to obtain my labor and services. Jeffs did this knowingly using his fraudulent scheme, plan, and pattern to cause me to believe that if I did not provide labor and services for him, I would suffer serious harm and physical restraint.

8. From the time I was 18 and no longer entitled to the necessities of life from my parents, I have usually been part of work crews that lived in extremely cramped and often deplorable housing with numerous other workers or by myself in a small shed and had only basic food and

utilities provided by the FLDS Church.

9. Those accommodations were provided at a basic level that allowed for mere survival in a communal setting akin to the poor standard of living experienced by other victims of labor trafficking. The value of those survival level necessities should be offset against the hourly rates (above minimum wage) that I should have been paid from the time I was required to work for the benefit of Jeffs.

10. Nevertheless, based on my experience in the FLDS, I estimate the value of those very basic necessities at \$300 a month. Based on that valuation over the 97 months from my 18th birthday on October 1, 2005 through October 31, 2013 when I left the FLDS to be \$29,100. That total may, at the Court's discretion, be deducted from my economic damages.

11. Before leaving, I was required to incur \$60,000 in debt for the church. I was told by Jeffs and still believed at that time that the destructions were coming. That justification was used to convince me that incurring debt did not matter in the future.

12. Therefore, I claim economic damages in the total amount of at least \$533,102 ( $\$502,202 + \$60,000 - \$29,100$ ).

13. Based on the evidence received by the Court in relation to my general or non-economic damages, I ask for an award of general damages in the amount of \$2,000,000.

14. I estimate that my total economic and non-economic damages are at least \$2,533,102 ( $\$533,102 + \$2,000,000$ ).

15. Finally, I request an award of punitive damages in an amount equal to my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

Thomas Cafarelli  
Thomas (Jeffs) Cafarelli